

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ECI SOFTWARE SOLUTIONS, INC.,

Plaintiff,

v.

**JOHN PLYLER PLUMBING AND
HARDWARE, INC.; OLSHAN LUMBER
COMPANY; AND PROSPERITY
COMPUTER SOLUTIONS, LLC,**

Defendants.

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CASE NO. _____

Declaration of Bryan Gauntt

I, Bryan Gauntt, declare pursuant to 28 U.S.C. § 1746, as follows:

1. My name is Bryan Gauntt. I am a Team Lead for a group within ECI Software Solutions, Inc (“ECI”) that supports the Advantage Software. I am over 18 years of age, of sound mind, and I am otherwise competent to make this declaration. As a Team Lead for the group that supports the Advantage Software, my job responsibilities generally include: providing necessary software support for Advantage Software, providing assistance to other technicians with regards to their support functions, and monitoring backups to ECI’s offsite backup server. Based on my position with ECI and my personal involvement with the events described herein, the facts stated in this declaration are within my personal knowledge and are true and correct.

2. On July 13, 2018, I was conducting a routine review of backup logs from the servers of ECI’s customers. I noticed that the servers of John Plyler Plumbing and Hardware, Inc. (“Plyler”) and Olshan Lumber Company (“Olshan”) were still backing up to ECI’s system in Texas. At the direction of my supervisor, Brian DuFour, I pulled the Point of Sale Header Files

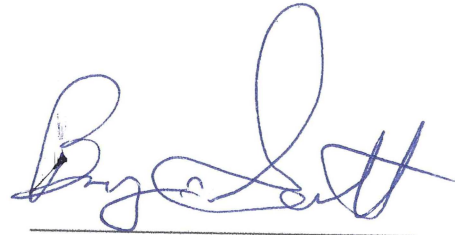
from Plyler's and Olshan's backup logs and copied them to a temporary dataset on ECI's system. I examined that Point of Sale Header Files and discovered they contained current point-of-sale activity. I informed Brian DuFour about the current activity and took screenshots of the relevant activity as displayed on the screen of the computer I was using to access the information and sent them to Brian DuFour. True and correct copies of those screenshots as they appeared on the screen of the computer I was using to access the information are attached to this Declaration as Exhibit 1. Owing to confidentiality concerns, portions of the screenshots have been redacted. I also copied the encoded files in the software indicating when the Plyler's and Olshan's licenses would expire and thereby terminate their ability to continue using the software (the "License Expiration Files") from Plyler's and Olshan's backup logs and sent them to Brian DuFour.

3. On July 24, 2018, Brian DuFour gave me a new encoded entry to put in a License Expiration File with an encoded expiration date of July 31, 2018. I then put the encoded entry in the License Expiration File and sent the updated License Expiration File to Plyler's and Olshan's Advantage software to trigger countdown messages on Plyler's and Olshan's systems stating that their Advantage software licenses would expire in seven days under the assumption that they would contact ECI to discuss their continued use of the software. To my knowledge, however, neither Plyler nor Olshan contacted ECI about renewing their licenses.

4. On July 25, 2018, I reviewed the backup logs from Plyler's and Olshan's servers and discovered that their License Expiration Files had been modified once again. I notified Brian DuFour that the License Expiration Files had been modified again and sent them to him.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 2, 2018 in Kansas.

A handwritten signature in blue ink, appearing to read "Bryan Gauntt", is written over a horizontal line.

Bryan Gauntt

EXHIBIT 1

[Esc]-Exit [Ins]-Add [F2]-View [Enter]-Change [Del]-Delete
 Left/right arrows change search mode. Up/down arrows & [PgUp]/[PgDn] scroll.
 fxpsshdr 1312.045-5126 /data/work3/wadee2/userdata/ 07/13/2018
 POS order/quote/est headers

Order #	Date	Sold to	Ship to
1522892	07/11/2018	CEN	CEN
1522893	07/11/2018	GAI	PER
1522894	07/11/2018	SCO	MCG
1522895	07/11/2018	SCO	MCG
1522896	07/11/2018	CIT	CIT
1522897	07/11/2018	KEL	KEL
1522898	07/11/2018	CAD	CAD
1522899	07/11/2018	SCO	MCG
1522900	07/11/2018	BAR	BAR
1522901	07/11/2018	SCO	per
1522902	07/11/2018	FUT	FUT
1522903	07/11/2018	STE	CHI
1522904	07/11/2018	ROB	per
1522905	07/11/2018	JAS	JAS

Order number:

MYLER

[Esc]-Exit [Ins]-Add [F2]-View [Enter]-Change [Del]-Delete
 Left/right arrows change search mode. Up/down arrows & [PgUp]/[PgDn] scroll.
 fxpsshdr 1312.045-5959 /data/work3/wadee2/userdata/ 07/13/2018
 POS order/quote/est headers

Order #	Date	Sold to	Ship to
52047415	07/12/2018	Cl	Cl
52047416	07/12/2018	!CA	!CA
52047417	07/12/2018	DEB	DEB
52047418	07/12/2018	Per	Per
52047419	07/12/2018	CED	CED
52047420	07/12/2018	TYL	Tyl
52047421	07/12/2018	HAZ	HAZ
52047422	07/12/2018	JOS	JOS
52047423	07/12/2018	!CA	!CA
52047424	07/12/2018	!CA	!CA
52047425	07/12/2018	!CA	!CA
52047426	07/12/2018	FRA	!CA
52047427	07/12/2018	Rox	Ara
52047428	07/12/2018	!CA	!CA

Order number:

OLSHAN